

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA		
Plaintiff,		
v.		No. 07 CR 799-19
		Honorable Ronald A. Guzman
		Honorable Geraldine Soat Brown
MICHAEL MYINT		
Defendant		

EMERGENCY PETITION TO ENLARGE THE CONDITIONS OF RELEASE

Michael Myint, defendant herein, through his attorney, Carl P. Clavelli, respectfully submits the following request to enlarge the conditions of pretrial release, and states as follows:

1. On December 7, 2007, the defendant surrendered pursuant to the instant Complaint and was taken into custody. On December 10, 2007, the defendant was placed on pretrial release; a residential property which he owns was posted as security. To date, he has obeyed each of the conditions of that release Order.

2. Until his arrest in the instant case, he has been regularly employed, most recently with Deloitte & Touche located at 111 W. Wacker Drive, Chicago, Illinois. He was terminated from that position due to the present charges. Since that time he has been seeking permanent employment which has proven difficult because of the pending charges.

3. On March 6, 2008, he received notice from a temporary staffing agency: Wise Choice IT, Inc. Milwaukee, Wisconsin (414-773-0676) that it had a client with a present though temporary need for the type of computer services he had been providing at his

last permanent employment. Should this Court approve of the requested enlargement of the conditions of pretrial release, Mr. Myint would be working for the near future at Miller Brewing Co., 651 N. 39th Street, Milwaukee, WI..

4. The defendant respectfully request permission to accept this employment as he is without sufficient funds to remain unemployed during the pretrial period due to several fixed expenses to which he had previously committed. He also must fund his legal defense as he has retained counsel. Should this Court allow him to travel to Milwaukee for employment purposes, his present plan is to reside at a motel Monday thru Thursday evenings, and return to the Northern District of Illinois where he would remain Friday evening thru Sunday.

5. Mr. Myint is a citizen having been naturalized in 1984. He and his family are longstanding residents of the Northern District of Illinois having resided here for thirty years. He attended schools here and graduated from Von Steuben High School. As first indicated in his Petition Seeking Pretrial Release, since his graduation from Northern Illinois University in 1996, Mr. Myint has remained employed in the field of information technology.

6. The undersigned counsel has related the contents of this Motion to the pretrial services officer, Stephanie Norwood, and has alerted each of the assistant United States Attorneys assigned to this matter of these particulars.

7. Also as stated in his Petition Seeking Pretrial Release the defendant understands that the offenses charged are serious but but avers that certain of the allegations have been known to him for a substantial period of time and he has

maintained his usual schedule of activities without leaving this jurisdiction. There is no danger of this defendant not appearing to answer any charges against him or of failing to obey each and every condition Ordered by this Court. There is no other reason not to permit his release to include travel to the City of Milwaukee for employment purposes as requested herein.

WHEREFORE, for the above and foregoing reasons, Michael Myint, defendant herein, moves for the entry of an Order granting him an enlargement of his pretrial release .as requested.

Respectfully submitted,

/S/ Carl P. Clavelli
Carl P. Clavelli
321 S. Plymouth Court Suite 1500
Chicago, IL 60604
Attorney for Michael Myint
(312) 922-5460